



September 22, 2005

Frank Foote
Chief, Regulations and Rulings Division
Alcohol & Tobacco Tax & Trade Bureau
1310 G Street, N.W.
Washington, DC 20005

Re: TTB Notice # 41

Dear Mr. Foote:

I am writing because I am concerned with impact any new mandatory labeling requirements would have on my business. The cost of regulation on my business is taking any "fiz" out of the craft beer business.

I agree with the findings of The Brewers Association survey concerning the potential effects the requirements of TTB Notice #41 would have on my operation. The sheer volume of requirements balanced against the available square inches on a body label will require the use of a back label which triggers an expensive retooling and upgrade of our antiquated label equipment. Also, we have sunk cost in graphic artists, plates and artwork for our existing labels, plus ongoing lab testing services all add up to a margin killing burden on my small business.

I have real concerns with the effects such requirements might have on my seasonal beer program. I use one barcode for many styles that rotate in and out depending on my customers demands and the season. This is one aspect of being a small brewer that is an advantage over the larger brewers—continuous creativity. For example, I just released a Honey Basil Ale. The costs associated with the need for a wide variety of seasonal labels due to a small change in ingredients or alcohol content could make it prohibitive to offer the variety our consumers have come to expect.

Long phase in times, grandfathered labels, or annual production volume exemptions would minimize only some of the total costs of these proposed regulations. My vote is to leave things the way they are. Thank you for considering of my comments before reaching a decision on this matter.

Sincerely yours,

Daniel Del Grande
Owner and Brewer